

Kelly J. Neubecker, Agent for:
Nickolas Mineau
16784 SW 95th Street
Miami, FL, 33196

Dear Kelly J. Neubecker:

This email is to inform you that the following information is required to continue processing your petition for exemption dated January 12, 2021, which you submitted on behalf of Ohana Drone (Docket No. FAA-2021-0043). This information is necessary for the Federal Aviation Administration (FAA) to process your petition. We request you provide the following information to us no later than Feb 16, 2022:

1. Ohana Drone Unmanned Aircraft System (UAS) Flight Operations and Procedures Manual (FOPM) does not address night operations or one pilot simultaneously operating two UA. Please revise the FOPM to address these topics.

[The attached FOPM has been revised to reflect the multiple aircraft operations](#)

2. Ohana Drone Unmanned Aircraft Systems (UAS) Aircrew Training and Procedures Program does not address night operations or one pilot simultaneously operating two UA. Please revise the UAS Aircrew Training and Procedures Program to address these topics.

[The Training manual has been revised to reflect the night operations. The FOPM covers the multiple aircraft procedures.](#)

3. The Ohana Drone Night Operations Safety Risk Management (SRM) Case does not adequately address the risk, or provide mitigations, for the following hazards:

- a) Intrusion of persons, vehicles, or livestock onto property being sprayed
- b) Pilot or VO inadvertently losing their night vision
- c) Difficulty of determining UA position relevant to potential hazards

Please revise the SRM to address these hazards.

[The attached SRM has been revised to address these hazards](#)

4. Your petition for exemption states “[a] separate safety case for the operation of (2) multiple aircraft accompanies this petition.” However, the document posted to Docket FAA-2021-0043 with the file name “Ohana Safety Case multiple operations”, when

opened, has the title “OHANA DRONE NIGHT OPERATIONS SAFETY RISK MANAGEMENT (SRM) CASE”. Please provide a safety case for the operation of (2) multiple aircraft.

The attached SRM has been revised and addresses the multiple aircraft operations.

5. Please provide specific details regarding UAS lighting. Your petition for exemption states “[t]he AGRAS T-16 has Long-range visible, high intensity LED strobes”. However, the DJI Agras T16 manufacturer’s user manual does not mention strobe lights. The only reference to lighting we can find in the DJI Agras T16 user manual is on page 11, which states “5. Aircraft Front LEDs (on the three front arms)”. For our analysis, we require accurate, detailed information regarding UAS lighting.

This has been corrected in the safety cases.

6. Regarding pilot training, your petition for exemption, on page 18, states that aeronautical knowledge for night is “not applicable”. Please clarify.

This has been changed in the attached revised Petition for Exemption

What You Need To Do:

If you want the FAA to process your request any further, you must send the information described above by Feb 16, 2022 before 11:59PM ET. We will consider your petition request open during this period.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to Sean O’Tormey and John Attebury at Sean.P.O'Tormey@faa.gov and John.h.Attebury@faa.gov, respectively.